



**AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY**

**TITLE V OPERATING PERMIT**

Permit No.: 142-97-TV (R1)

Plant ID: 1216

Effective Date: 2 August 2000

Expiration Date: 2 August 2005

UTM Northing: 4225.30

UTM Easting: 609.7

SIC No.: 3489

NAICS: 332995      AFS: 01216

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

**United Defense LP  
163 Rochester Drive  
Louisville, KY 40214-2683**

The applicable procedures of District Regulation 2.16 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: United Defense LP

Responsible Official: Linda Medley

Title of Responsible Official: Operations Manager

Date Application Received: 22 April 1997

Revision: 27 April 2000

Date Application Administratively Complete: 11 June 1997

Date Public Notice Given: 23 April 2000

---

Reviewing Engineer (37)

---

Air Pollution Control Officer

## Table of Contents

Title V Permit Revisions/Changes .....	4
Abbreviations And Acronyms .....	5
Preamble .....	6
General Conditions .....	7
Emission Unit B3 - B6 Description .....	15
Applicable Regulations .....	15
Allowable Emissions .....	15
Components .....	15
Control Devices .....	15
Additional Conditions .....	15
Emission Unit P1- P4 Description: Four (4) paint booths .....	19
Applicable Regulations .....	19
Allowable Emissions .....	19
Control Devices .....	20
Additional Conditions .....	20
Emission Unit BU1 - BU3 Description: Three (3) Blast Booths .....	26
Applicable Regulations .....	26
Allowable Emissions .....	26
Components .....	26
Control Devices .....	27
Additional Conditions .....	27
Emission Unit PE1 - PE12 Description: Chromium Electroplating/Anodizing Operation .....	30
Applicable Regulations .....	30
Components .....	31
Control Devices .....	32
Additional Conditions .....	33
Emission Unit C1 Description: Powder coating operation .....	40
Applicable Regulations: .....	40
Allowable Emissions: .....	40
Components .....	40
Control Devices .....	40
Addition Conditions .....	40
Emission Unit F1 Description: Fiberglass Repair Facility .....	44
Applicable Regulations: .....	44
Allowable Emissions: .....	44
Control Devices: .....	44

Additional Conditions .....	44
Emission Unit PC Description: Parts Cleaners (Cold Solvent) .....	47
Applicable Regulations: .....	47
Allowable Emissions: .....	47
Control Devices: .....	47
Additional Conditions .....	47
Permit Shield .....	50
Off Permit Documents .....	50
Alternative Operating Scenarios .....	50
Source-Wide HAP Speciation .....	50
Insignificant Activities .....	51

**Title V Permit Revisions/Changes**

<b>Revision No.</b>	<b>Date of Issuance/ Reissuance</b>	<b>Public Notice Date</b>	<b>Type</b>	<b>Emission Unit./Page No.</b>	<b>Description</b>
N/A	8/02/2000	04/23/2000	N/A	Entire Permit	Initial Issuance
1	1/14/2003	N/A	Administrative	Emission Unit PE1-12	Incorporate PS3 and PS6 performance indicator range

### Abbreviations And Acronyms

AC	- Additional Condition
AFS	- AIRS Facility Subsystem
AIRS	- Aerometric Information Retrieval System
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
°C	- Degrees Centigrade
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
cf	- Cubic foot
DOE	- District Only Enforceable
°F	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
lbs	- Pounds
l	- Liter
MACT	- Maximum Achievable Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industry Classification System
NSR	- New Source Review
NO <sub>x</sub>	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
TAL	- Threshold Ambient Limit
TAP	- Toxic Air Pollutant
tpy	- Tons per year
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound

### **Preamble**

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," as defined in District Regulation 2.16, section 1.22 which was current as of the date the permit was proposed for review by USEPA, Region 4. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply. No periodic monitoring shall be required for facilities designated as insignificant activities.

### General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:  
  

***US EPA - Region IV  
Air Enforcement Branch  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-8960***
3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
  - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
  - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.
5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
  - ii. The permitted facility was at the time being properly operated.
  - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
  - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)
9. **Enforcement Action Defense**



- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.
11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)
12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)
13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:
  - a. Enter the premises to inspect any emissions-related activity or records required in this permit.
  - b. Have access to and copy records required by this permit.
  - c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
  - d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.  
(Regulation 2.16, section 4.3.2)
14. **Monitoring and Related Record keeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year.

All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited

to:

- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
  - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
  - c. Knowingly making any false statement in any permit application.
  - d. Noncompliance with Regulation 1.07, section 4.2; or
  - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
  26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
  27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
  28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
  29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
  30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
  31. **Risk Management Plan (112®)** - For each process subject to Section 112® of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
  32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
  33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.

34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.

35. **Submittal of Reports, Data, Notifications, and Applications**

- a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

***Air Pollution Control District of Jefferson County  
850 Barret Ave  
Louisville, KY 40204-1745***

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

***US EPA - Region IV  
APTMD - 12th floor  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-3104***

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>	
<b>Regulation</b>	<b>Title</b>
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>	
<b>Regulation</b>	<b>Title</b>
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for <i>Existing Affected Facilities</i> )
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i> )

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>	
<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees
8.03	Commuter Vehicle Testing Requirements

37. **Stratospheric Ozone Protection Requirements** - Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts A, B, and F. Those requirements include the following restrictions:

- a. Any facility having any refrigeration equipment normally containing fifty (50) pounds of refrigerant, or more, must keep servicing records documenting the date

and type of all service and the quantity of any refrigerant added according to 40 CFR 82.166;

- b. No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided in 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved according to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;
- c. No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or II substance in 40 CFR 82, Subpart A, Appendices A and B, except in compliance with 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166.
- d. No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined in 40 CFR 82.152) for service, maintenance, or repair unless the person has been properly trained and certified according to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance according to 40 CFR 82.158 and unless the person observes the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
- e. No person may dispose of appliances (except small appliances, as defined in 40 CFR 82.152) without using equipment certified for that type of appliance according to 40 CFR 82.158 and without observing the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
- f. No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82 Subpart F;
- g. If the permittee manufactures, transforms, imports, or exports, a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), the permittee is subject to all requirements as specified in 40CFR82 Subpart A, Production and Consumption Controls.

DISTRICT ONLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures and Additional Programs Fees
8.03	Commuter Vehicle Testing Requirements

**Emission Unit B3 - B6 Description:** Four (4) boilers used to create steam for building heat and industrial processes. The boilers have the capability to burn natural gas and #2 fuel oil. The company may combust # 2 fuel oil in any of these boilers as an alternative operative scenario.

**Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.06	Standards of Performance for New Indirect Heat Exchangers	1, 2, 3, 4.1.3, 4.2, 5.1.1 and 8

**Allowable Emissions:**

<b>Emission Pt</b>	<b>Regulated Air Pollutant</b>	<b>Standard/Limit</b>
E1, E2, E3, and E4	SO <sub>2</sub>	1.0 lb/MMBtu heat input
	PM	0.29 lb/MMBtu heat input
		20% Opacity

**Components:**

<b>Emission Pt</b>	<b>Description</b>	<b>Control ID</b>
E1	33.5 MMBtu/hr, installed in 1952, rebuilt in 1982 (Boiler 1)	N/A
E2	33.5 MMBtu/hr, installed in 1952, rebuilt in 1982 (Boiler 2)	
E3	33.5 MMBtu/hr, installed in 1952, rebuilt in 1982 (Boiler 3)	
E4	33.5 MMBtu/hr, installed in 1952, rebuilt in 1982 (Boiler 4)	

**Control Devices:** There are no control devices associated with this Emission Unit.

**Additional Conditions**1. **Standards** (Regulation 2.16, section 4.1.1)

## a. PM (Regulation 7.06, Section 4)

The owner or operator shall not allow or cause the PM emissions to exceed the allowable emission rate specified in this permit as determined pursuant to Section 4 of Regulation 7.06.

## b. Opacity (Regulation 7.06, section 4.2)

The owner or operator shall not allow the opacity to exceed 20% except:

- i. For indirect heat exchangers with a heat input capacity of less than 250 million BTU/hr, a maximum of 40% opacity shall be permissible for not more than two consecutive minutes in any 60 consecutive minutes;
  - ii. For indirect heat exchangers with heat input capacity of less than 250 million BTU/hr, a maximum of 40% opacity shall be permissible for not more than six consecutive minutes in any 60 consecutive minutes during cleaning the fire box or blowing soot; or
  - iii. For emissions from an indirect heat exchanger during building a new fire for the period required to bring the boiler up to operating conditions provided the method used is that recommended by the manufacturer and the time does not exceed the manufacturer's recommendations.
- c. Sulfur Dioxide (Regulation 7.06, section 5.1)

No owner or operator of an affected facility shall cause to be discharged into the atmosphere from that affected facility any gases which contain sulfur dioxide in excess of that specified below:

For sources which have a total heat input capacity 145 million BTU per hour or less, the standard is 1.0 pound per million BTU actual heat input for combustion of liquid and gaseous fuels as determined by section 3.1 of Regulation 7.06.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

- a. PM and SO<sub>2</sub>
  - i. The owner or operator shall monitor and record the monthly fuel usage and type for each boiler.
  - ii. Additional compliance monitoring shall be the record keeping requirement specified in AC # 3.a.
- b. Opacity
  - i. The owner or operator shall comply with the following opacity monitoring requirements for each boiler when combusting natural gas:
    - 1) The owner or operator shall conduct a weekly one (1) minute visible emissions survey for stacks S-1, S-2, S-3, and S-4; or
    - 2) If during twelve (12) consecutive operating weeks there are no visible emissions observed from stacks S-1, S-2, S-3, and S-4, the owner or operator may elect to conduct a monthly visible emission survey.



- 3) If visible emissions are observed from stacks S-1, S-2, S-3 or S-4, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If visible emissions persist, the owner or operator shall, within 24 hours, perform a Method 9 test. If the opacity is exceeding the standard, the owner or operator shall notify the District and take all practical steps to eliminate the exceedance. For each boiler that visible emissions were observed, the owner or operator shall initiate the monitoring schedule specified in AC # 2.b.i.1) above.
      - ii. The owner or operator shall comply with the following opacity monitoring requirements for each boiler combusting fuel oil:
        - 1) For each operating day, the owner or operator shall conduct a three (3) minute visible emissions survey.
        - 2) If visible emissions are observed from stacks, S-1, S-2, S-3 or S-4, the owner or operator shall initiate corrective action within eight (8) hours of the initial observation. If visible emissions persist, the owner or operator shall, within 24 hours, perform a Method 9 test. If the opacity is exceeding the standard, the owner or operator shall notify the District and take all practical steps to eliminate the exceedance.
3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. PM and SO<sub>2</sub>
    - i. The owner or operator shall maintain purchase records that show heating value, ash and sulfur content (weight %) for each shipment of fuel oil.
    - ii. The owner or operator shall maintain a log at the facility to identify which alternative operating scenario in which it is operating. Contemporaneously with making the change from one operating scenario to the other, a record shall be entered into the log. (Regulation 2.16, section 4.1.17.1)
  - b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from AC # 2.b.i.3. or AC # 2.b.ii.2) above shall be documented and records made available to the District upon request.
4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. PM and SO<sub>2</sub>

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM and SO<sub>2</sub>:

- i. Emission Unit/Point ID Number;
- ii. The beginning and ending date of the reporting period;
- iii. All periods of exceedances of the PM and SO<sub>2</sub> emission standard including the quantity of excess emissions;
- iv. Reason for excess emissions; and
- v. Description of any corrective action taken to prevent future exceedances of the PM or SO<sub>2</sub> emission standard.

## b. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each Method 9 performed. If no Method 9 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
- iv. Description of any corrective action taken pursuant to AC # 2.b.i.3. or AC# 2.b.ii. 2 above.

**Emission Unit P1- P4 Description:** Four (4) paint booths for coating of metal and non-metal parts with two (2) drying ovens.

**Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.05	Compliance with Emission Standards and Maintenance Requirements	1, 2, 4.1.1, and 5
6.43	Daily Emission Limits	1, 2, 3, 4, and 19
7.08	Standards of Performance for New Process Operations	1, 2, 3.1, 3.2, and 3.3
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, and 5
7.59	Standards of Performance For New Miscellaneous Metal Parts and Products Surface Coating Operations	1, 2, 3.1, 3.1.3, 4, 5, 6 and 7

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	Sections 1, 2, 3, 4, 5 and 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

**Allowable Emissions:**

<b>Emission Pt</b>	<b>Regulated Air Pollutant</b>	<b>Standard/Limit</b>
E5, E6, E7 & E8	PM	2.34 lbs/hr for each paint booth
		< 20% Opacity
	VOC	See AC # 1.c.
	TAPs	See AC # 1.d.

**Components:**

<b>Emission Pt</b>	<b>Description</b>	<b>Control ID</b>
E5	Paint booth No. 1 designated as P1	Dry Filter
E6	Paint booth No. 2 with small oven designated as P2	
E7	Paint booth No. 3 with small oven designated as P3	
E8	Paint booth No. 4 with large oven designated as P4	

**Control Devices:** Dry Filter System to control PM emissions.

### **Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)

a. **PM** (Regulation 7.08, Section 3)

- i. For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 in Regulation 7.08. (section 3.4)
- ii. The owner or operator shall monitor compliance with the PM emission standard using the following calculation methodology:

$$E_{PM} = (W)(S)(C_A)(TE)(CE)/H_{OP}$$

where:

W = Weight of one gallon of coating

S = % by wgt of solids

C<sub>A</sub> = Gallons of coating applied per operating day

TE = Transfer efficiency

CE = Control efficiency

H<sub>OP</sub> = # of operating hours per operating day

E<sub>PM</sub> = Average Hourly PM emissions

b. **Opacity**

The owner or operator shall not cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (Section 3.3)

c. **VOC**

- i. No owner or operator shall construct or operate an affected facility unless it is equipped with an utilizes Best Available Control Technology (BACT) as determined at the time of the construction permit review by the District. Emission rates in terms of pounds per hour and/or work practice, equipment specifications, and/or raw material specifications shall be set out as permit conditions on the construction and/or operating permits to insure compliance with this requirement. (Regulation 7.25, section 3.1)
- ii. Affected facilities permitted prior to 16 December 1987, that emit no more emissions than that permitted at such date shall be deemed to be in compliance. (Regulation 7.25, section 3.2)
- iii. The time period for compliance determination shall not exceed 24 hours and

may be less if limited by a permit restriction, but it shall not exceed the hours operated in a day. (Regulation 7.25, section 3.3)

- iv. The total plant-wide VOC emissions shall not exceed 5 tons during any consecutive 12-month period for all emission units subject to Regulation 7.25.
- v. The owner or operator shall not allow or cause the combined VOC emissions from the United Defense Louisville Plant to exceed 255 lb per day. (Regulation 6.43, Section 19)
- vi. The owner or operator shall not allow or cause the emissions of VOC from any affected facility resulting from the coating of metallic surfaces in excess of the following: (Regulation 7.59, section 3.1)
  - 1) 4.3 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for clear coatings
  - 2) 3.5 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for air-dried coatings
  - 3) 3.5 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for extreme performance coatings
  - 4) 3.0 lb of VOC/gal of coating, excluding water and exempt solvents, as applied for all other coatings
- vii. The owner or operator shall determine compliance with AC # 1.c.vi. based on a calendar month averaging period. (Regulation 7.59, section 3.2)

d. TAPs

The owner or operator shall not allow the emissions of TAPs to exceed the ASL value specified in Regulation 5.12, unless modeling or a BACT analysis has been submitted and approved by the District. The following TAPs were identified in the Title V permit application for this emission unit: butyl alcohol, methyl isobutyl ketone, ethyl benzene, toluene, methyl ethyl ketone, xylene, chromium, manganese, phenol, and di(2-ethylhexyl)phthalate.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. PM

- i. The owner or operator shall, for each operating day, conduct daily inspections of the Dry Filter System to ensure the system is effectively controlling PM emissions. Daily manometer readings shall be recorded in a log. The performance indicator range shall be 0 - 0.3" H<sub>2</sub>O. Any manometer reading exceeding 0.3" H<sub>2</sub>O shall warrant visual inspection of the filter media and the filter media changed if necessary.
- ii. Additional compliance monitoring shall be the record keeping requirement

specified in AC # 3.a.

b. Opacity

- i. The owner or operator shall conduct a weekly one (1) minute visible emission surveys for stacks S-5, S-6, S-7, and S-8; or
- ii. If during twelve (12) consecutive operating weeks there are no visible emissions from stacks S-5, S-6, S-7, and S-8, the owner or operator may elect to conduct monthly visible emission surveys.
- iii. If visible emissions are observed from either stack S-5, S-6, S-7, or S-8, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance. For each stack that visible emissions were observed, the owner or operator shall initiate the monitoring schedule specified in AC# 2.b.i. above.

c. VOC

Compliance monitoring shall be the record keeping requirements specified in AC # 3.c.

d. TAPs

To monitor ongoing compliance with District regulation 5.12, the owner or operator shall comply with the record keeping requirement specified in AC # 3.d.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. PM

The owner or operator shall maintain the following daily records to demonstrate ongoing compliance with the PM emission limits:

- i. The quantity, type and percent solids of each coating used for each operating day; and
- ii. The results of the daily manometer readings required by AC # 2.a.i.

b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not

visible emissions were observed. Any correction actions resulting from AC # 2.b.iii. above shall be documented and records made available to the District upon request.

c. VOC

- i. The owner or operator shall maintain the following monthly records to demonstrate ongoing compliance with AC # 1.c.iv:
  - 1) The quantity and VOC content of each coating applied on a non-metal surface; and
  - 2) The total VOC emissions for each calendar month from the surface coating of non-metal surfaces.
- ii. The following records shall be maintained to demonstrate ongoing compliance with the emission limit specified in AC # 1.c.v.:
  - 1) Product name for each coating, solvent, and cleaner used each day;
  - 2) Total daily gallons of each product used;
  - 3) VOC content of each product, in pounds per gallon; and
  - 4) Total daily VOC emissions
- iii. The owner or operator shall maintain the following monthly records to demonstrate ongoing compliance with AC # 1.c.vi:
  - 1) The regulation and section number applicable to the affected facility for which the records are being maintained;
  - 2) The application method and substrate type (metal, plastic, etc.);
  - 3) The amount and type of coatings (including catalyst and reducer for multicomponent coatings) and solvent (including exempt compounds) used at each point of application during the averaging period. The District may specifically authorize the usage record to reflect a period longer than the compliance averaging period, with the usage prorated for each compliance averaging period by a method approved by the District. In this case, the usage record period shall not exceed 1 calendar month;
  - 4) The VOC content as applied in each coating and solvent;
  - 5) The date, or usage record period, for each application of coating and solvent;
  - 6) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during the averaging period. The District may specifically authorize the usage record to reflect a period longer than the compliance averaging period, with the usage prorated for each compliance averaging period by a method approved by the District. In this case, the usage record period shall not exceed 1 calendar month; and
  - 7) Oven temperature, where applicable.

## d. TAPs

The owner or operator shall maintain a daily records of coating usage which includes the weight % of each TAP for each coating type applied and the number of operating hours for each operating day to demonstrate that the emission rates established during the initial compliance demonstration are not exceeded.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

## a. PM

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for emission units subject to Regulations 7.08:

- i. Emission Unit/Point ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of all periods of exceedances of the hourly PM emission limit for each paint booth including the quantity of excess emissions;
- iv. Reason for excess emissions whether process upset, control device malfunction, other known causes, or unknown causes; and
- v. Description of any corrective action taken to prevent future exceedances of the PM emission standard.

## b. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each Method 9 conducted. If no Method 9 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
- iv. Description of any corrective action taken pursuant to AC # 2.b.iii.

## c. VOC

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 7.25:

- 1) Emission Unit/Point ID number;
- 2) The beginning and ending date of the reporting period; and
- 3) The twelve consecutive month VOC emissions for each month of the reporting period resulting from the surface coating of non-metal



parts.

- ii. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 6.43:
  - 1) Emission Unit/Point ID number;
  - 2) The beginning and ending date of the reporting period;
  - 3) Number of operating days in the reporting period;
  - 4) Total VOC emissions in the reporting period;
  - 5) Identification of all periods of exceedance of the daily VOC emission limit specified in AC # 1.c.v. including the quantity of excess emissions; and
  - 6) Description of any corrective action taken to prevent future exceedances of the daily VOC emission limit.
- iii. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 7.59:
  - 1) Emission Unit/Point ID number;
  - 2) The beginning and ending date of the reporting period;
  - 3) Identification of all periods of exceedances of the coating VOC content limit based on a monthly average including the quantity of excess emissions; and
  - 4) Description of any corrective action taken to prevent future. exceedances of the coating VOC content limit.

**Emission Unit BU1 - BU3 Description:** Three (3) Blast Booths to clean parts

**Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.08	Standards of Performance for New Process Operations	1, 2, 3.1, 3.2, and 3.3

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5 and 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

**Allowable Emissions:**

<b>Emission Pt</b>	<b>Regulated Air Pollutant</b>	<b>Standard/Limit</b>
E11, E12 & E14	PM	2.34 lbs/hr for each blast booth
		20% Opacity
	Cadmium	0.0006431 lbs/hr total
	Chromium	0.0006431 lbs/hr total
	Lead	0.0006431 lbs/hr total

**Components:**

<b>Emission Pt</b>	<b>Description</b>	<b>Control ID</b>
E11	Blast Booth 1	C1
E12	Blast Booth 2	C2
E14	Blast Booth 3	C4

**Control Devices:**

ID	Stack ID	Description	Performance Indicator	Range	Monitoring & Frequency	Reporting Frequency
C1	S - 11	Fabric Filter (E11)	Pressure drop	1-6" H <sub>2</sub> O	Record keeping Daily	Semi-annual
C2	S - 12	Fabric Filter (E12)	Pressure drop	1-6" H <sub>2</sub> O	Record keeping Daily	Semi-annual
C4	S - 14	Fabric Filter (E14)	Pressure drop	1-7" H <sub>2</sub> O	Record keeping Daily	Semi-annual

**Additional Conditions**1. **Standards** (Regulation 2.16, section 4.1.1)

## a. PM (Regulation 7.08, Section 3)

For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 of Regulation 7.08. (section 3.3)

## b. Opacity

No person shall cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (section 3.1)

## c. TAP

For those TAPs not specifically listed in the "Allowable Emissions" section on page 24 of this permit, the owner or operator shall not allow the emissions of TAPs to exceed the ASL value specified in Regulation 5.12, unless modeling or a BACT analysis has been submitted and approved by the District.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

## a. PM

- i. The owner or operator shall monitor and record the pressure drop across baghouses C1, C2 and C4 once each operating day.
- ii. Additional compliance monitoring shall be the record keeping requirement specified in AC # 3.a.

## b. Opacity

- i. The owner or operator shall conduct a daily one (1) minute visible emission survey for stacks S-11, S-12, and S-14 for each operating day.
- ii. At any stack where visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance.

## c. TAPs

Compliance monitoring for TAPs shall be the record keeping requirement in AC # 3.c.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

## a. PM

The owner or operator shall maintain the following records on a daily basis, except where noted otherwise, to monitor ongoing compliance with the PM emission limits:

- i. The total quantity of blasting media used in each blast booth for each operating day;
- ii. The total number of parts processed in each blast booth for each operating day;
- iii. The total quantity (in lbs) of paint or other material recovered for each calendar month (monthly);
- iv. The time periods when control devices C1, C2 or C4 were not in service when the emission unit was in operation; and
- v. The results of the pressure drop readings required by AC # 2.a.i.

## b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from AC # 2.b.ii. above shall be documented and records made available to the District upon request.

## c. TAPS

The owner or operator shall maintain the following records to monitor ongoing compliance with Regulation 5.12:

In addition to the record keeping requirement specified in AC # 3.a., the owner or operator shall maintain sufficient records to verify the weight % of each TAP used in this emission unit.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. PM

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 7.08:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of all periods of exceedances of the hourly PM emission limit including the quantity of excess emissions. If no exceedance of the PM emission standard occurred during the reporting period, the owner or operator may submit a negative declaration;
- iv. Reason for excess emissions whether process upset, control device malfunction, other known causes, or unknown causes; and
- v. Description of any corrective action taken.

b. Opacity

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit/Point ID number and Stack ID number;
- ii. The beginning and ending date of the reporting period;
- iii. The date, time and results of each Method 9 conducted. If no Method 9 tests were conducted during the reporting period, the owner or operator may submit a negative declaration;
- iv. Description of any corrective action taken pursuant to AC # 2.b.ii.

c. Control Devices C1, C2 and C4

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for control devices C1, C2 and C4:

- i. Emission Unit ID number and Control ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of the operating parameter being monitored to demonstrate ongoing compliance;
- iv. Summary information on the number, duration and cause of all excursions. Excursion is defined as any departure from the performance indicator range established for the control device; and
- v. Description of the corrective action taken for each excursion.

**Emission Unit PE1 - PE12** Description: Chromium Electroplating/Anodizing Operation

**Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
40 CFR Part 63, Subpart A	General Provisions	See Table 1 in 40 CFR 63, Subpart N
40 CFR Part 63, Subpart N	National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks.	63.340 (a), (b), (c), (d) & (e); 63.341; 63.342 (a), (b), (c)(1)(ii), (c)(2)(i)(A,B), (c)(2)(ii); (d)(1,2); (f)(1)(i,ii,iii), (f)(2)(i),(f)(2)(ii)(A,B,C); (f)(3)(i)(A,B,C,D,E); (f)(3)(ii, iii, iv, v, vi); 63.343 (a)(1)(ii), (a)(3), (a)(4), (a)(5), (a)(6); (b)(1,2,3); (c)(2),(c)(8); 63.344 (a), (b), (c), (d); 63.345 (a), (b); 63.346 (a), (b)(1 through 12), (15), (16); 63.347 (a), (b), (c), (d), (e)(1),(2)(i, ii, iii, iv, v, vi, vii, viii, ix), (3); (f)(1), (2); (g)(1), (2), (3)(i, ii, iii, iv, v, vi, vii, viii, ix, x, xi)

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.02	Federal Emission Standards for Hazardous Air Pollutants Incorporated By Reference	2, 3, 4 and 5
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5 and 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

**Components:**

<b>Equip ID</b>	<b>Description</b>	<b>Control ID</b>	<b>Applicable Regulation</b>
PE 11	Hard chrome plating tank - maximum rectifier capacity of 10,000 amps T-102	C12	40 CFR Part 63, Subpart N
PE 11	Hard chrome plating tank - maximum rectifier capacity of 6,000 amps T-104	C12	40 CFR Part 63, Subpart N
PE 11	Hard chrome plating tank - maximum rectifier capacity of 10,000 amps T-106	C12	40 CFR Part 63, Subpart N
PE 11	Hard chrome plating tank - maximum rectifier capacity of 12,000 amps T-900	C12	40 CFR Part 63, Subpart N
PE 3	Chrome anodizing tank - maximum rectifier capacity of 500 amps T-532	C7	40 CFR Part 63, Subpart N
The following equipment is not subject to 40 CFR Part 63, Subpart N			
PE 1	Several tanks for parts cleaning/removing oxides	No Controls	5.12
PE 2	Several tanks for parts cleaning - Alkaline dearest and paint strip	No Controls	5.12
PE 4	Several tanks for water rinsing	No Controls	5.12
PE 5	Several tanks for water rinsing	No Controls	5.12
PE 6	Several tanks for pickling, phosphate, chromed seal, No and Cu	C-8	5.12
PE 7	Several tanks for anodizing, conversion coats	C-9	5.12
PE 8	Several tanks for parts stripping and rinsing	No Controls	5.12
PE 9	Several plating tanks (other than chromium)	C-10	5.12
PE 10	Several tanks for derusting	C-11	5.12
PE 12	Several tanks for nickel plating	C- 13	5.12

**Allowable Emissions:**

Emission Pt	Regulated Air Pollutant	Total Emission Limit
PE-11 & PE-3	Hexavalent Chromium	See AC # 2. d. & e.
PE1-2; PE4-10 & PE12 810, 820, 822 & 862, 260, 824, 826, 830, 832, 874, 876, 224, 228, 464, 600, 800, 805, 840, 842, 850 & 852, 226, 229, 236, 208, 209, 230, 232, 200, 204, 214, 217, 218, 222, 223, 520, 650, 714, 716, 860, 720, 722, 238, 408, 506, 510, 512, 532, 614, 617, 700, 724, 412, 416, 418, 424, 426, 428, 460, 514, 516, 528, 538, 548, 606, 608, 370, 376, 378, 380, 381, 386, 388, 708, 124, 300, 302, 340, 346, 402, 406, 450, 502, 540, 544, 908, 348, & 349	Hydrochloric acid	4.47 lbs/hr
	Manganese	2.18 lbs/hr
	Nitric acid	2.18 lbs/hr
	Phosphoric acid	2.18 lbs/hr
	Chromic acid	0.11 lbs/hr
	Sulfuric acid	2.18 lbs/hr
	Sodium hydroxide	3.07 lbs/hr
	Sodium dichromate	0.045 lbs/hr
	Zinc oxide	0.11 lbs/hr
	Oxalic acid	0.91 lbs/hr
	Nickel acetate	0.91 lbs/hr
	Cyanides, as CN	4.53 lbs/hr
	Cadmium	0.045 lbs/hr
	Copper	2.18 lbs/hr

**Control Devices:**

ID	Description	Performance Indicator	Range	Monitoring & Frequency	Reporting Frequency
C8-11 & C13	5 Packed Bed Scrubbers (PBS)	No parametric monitoring required <sup>1</sup>	N/A	N/A	N/A
C7	Packed Bed Scrubber (PBS-PS3)	Inlet Velocity Pressure	$0.73 \pm 10\%$ in H <sub>2</sub> O	Record keeping Daily	Semi-annual
		Pressure drop	$0.85 \pm 1$ in H <sub>2</sub> O		
C12	Packed Bed Scrubber (PBS-PS6)	Inlet Velocity Pressure	$0.57 \pm 10\%$ in H <sub>2</sub> O	Record keeping Daily	Semi-annual
		Pressure drop	$1.6 \pm 1$ in H <sub>2</sub> O		



- <sup>1</sup> The potential uncontrolled TAP emissions are below the applicable ASL value. These control devices are not subject to the requirements of 40 CFR Part 63, Subpart N.

### **Additional Conditions**

#### **1. Standards (40 CFR Part 63, Subpart N)**

- a. Each owner or operator of an affected source subject to the provisions of Subpart N shall comply with these requirements on and after the compliance dates specified in 63.343(a). All affected sources are regulated by applying maximum achievable control technology.
- b. The emission limitations apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for affected sources subject to Subpart N. The emission limitations do not apply during periods of malfunction, but the work practice standards that address operation and maintenance and that are required by 63.342 (f) must be followed during malfunctions.
- c. If an owner or operator is controlling a group of tanks with a common add-on air pollution control device, the emission limitations of 63.342 (c), (d), and (e) apply whenever any one affected source is operated. The emission limitation that applies to the group of affected sources is:
  - i. The emission limitation identified in 63.342 (c), (d), and (e) if the affected sources are performing the same type of operation (e.g., hard chromium electroplating), are subject to the same emission limitation, and are not controlled by an add-on air pollution control device also controlling nonaffected sources;
  - ii. The emission limitation calculated according to 63.344(e)(3) if affected sources are performing the same type of operation, are subject to the same emission limitation, and are controlled with an add-on air pollution control device that is also controlling nonaffected sources; and
  - iii. The emission limitation calculated according to 63.344(e)(4) if affected sources are performing different types of operations, or affected sources are performing the same operations but subject to different emission limitations, and are controlled with an add-on air pollution control device that may also be controlling emissions from nonaffected sources.
- d. Standards for hard chromium electroplating tanks. During tank operation, each owner or operator of an existing, new, or reconstructed affected source shall control chromium emissions discharged to the atmosphere from that affected source by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed:

- i. 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of ventilation air ( $6.6 \times 10^{-6}$  grains per dry standard cubic foot [gr/dscf]); or
  - ii. 0.03 mg/dscm ( $1.3 \times 10^{-5}$  gr/dscf) if the hard chromium electroplating tank is an existing affected source and is located at a small, hard chromium electroplating facility.
- e. Standards for chromium anodizing tanks. During tank operation, each owner or operator of an existing, new, or reconstructed affected source shall control chromium emissions discharged to the atmosphere from that affected source by either:
  - i. Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.01 mg/dscm ( $4.4 \times 10^{-6}$  gr/dscf); or
  - ii. If a chemical fume suppressant containing a wetting agent is used, by not allowing the surface tension of the electroplating or anodizing bath contained within the affected source to exceed 45 dynes per centimeter (dynes/cm) ( $3.1 \times 10^{-3}$  pound-force per foot [lbf/ft]) at any time during operation of the tank.
- f. Work practice standards. The work practice standards of this section address operation and maintenance practices.
  - i. At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan required by 63.342 (f)(3).
  - ii. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan required by 63.342(f)(3) of this section.
  - iii. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.
  - iv. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source.
  - v. Based on the results of a determination made under paragraph 63.342 (f)(2)(i), the Administrator may require that an owner or operator of an affected source make changes to the operation and maintenance plan required

by 63.342 (f)(3) for that source. Revisions may be required if the Administrator finds that the plan:

- 1) Does not address a malfunction that has occurred;
- 2) Fails to provide for the operation of the affected source, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or
- 3) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

vi. The following table is a summary of the work practice standards for the packed-bed scrubbers.

Control ID	Work Practice Standard	Frequency
P-6 and P-3	1. Visually inspect to ensure proper drainage, no chromic acid buildup on the packed-beds, and no evidence of chemical attack on the structural integrity.	1. Quarterly
	2. Visually inspect back portion of the Chevron blade mist eliminator to ensure that it is dry and no break through of chromic acid mist.	2. Quarterly
	3. Visually inspect ductwork from tank to the control device to ensure there are no leaks.	3. Quarterly
	4. Add fresh makeup water to the top of the packed-bed.	4. Whenever makeup is needed.

g. Small Hard Chromium Plating Facility Designation

The company requested to be classified as a Small Hard Chromium Plating Facility in a letter to the District dated 4 September 1998, therefore, the owner or operator shall comply with the following:

- i. Limit the total actual cumulative rectifier capacity to less than 60 million ampere-hours per year as determined on an annual basis.
- ii. Utilize nonresettable amp-hr meters
- iii. Maintain monthly records of the actual cumulative rectifier capacity. The actual cumulative rectifier capacity for each year shall be tabulated monthly by adding the capacity for the current month to the capacities for the previous 11 months. At such time, the monthly records show that the actual

cumulative rectifier capacity corresponds to the Large Hard Chromium Plating Facility designation over the previous 12-month rolling period, the owner or operator is subject to the emission limitation specified in 63.342(c)(1)(i), in accordance with the compliance schedule of 63.343(a)(5).

- h. Operation and maintenance plan. The owner or operator shall comply with all applicable requirements of 63.432(f)(3).
  - i. The owner or operator of an affected source subject to the work practices of 63.342 (f) shall prepare an operation and maintenance plan to be implemented no later than the compliance date. The plan shall be incorporated by reference into the source's title V permit, if and when a title V permit is required. The plan shall include the following elements:
    - ii. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emission limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment;
    - iii. For sources using an add-on air pollution control device or monitoring equipment to comply with this subpart, the plan shall incorporate the work practice standards for that device or monitoring equipment, as identified in Table 1 of section 63.342.
    - iv. If the specific equipment used is not identified in Table 1 of 63.342, the plan shall incorporate proposed work practice standards. These proposed work practice standards shall be submitted to the Administrator for approval as part of the submittal required under 63.343(d);
    - v. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and
    - vi. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions.
      - 1) If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.

- 2) Record keeping associated with the operation and maintenance plan is identified in 63.346(b). Reporting associated with the operation and maintenance plan is identified in 63.347(g).
- 3) If actions taken by the owner or operator during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by 63.342 (f)(3)(i), the owner or operator shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the owner or operator makes alternative reporting arrangements, in advance, with the Administrator.
- 4) The owner or operator shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the source is no longer subject to the provisions of Subpart N. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Administrator for a period of 5 years after each revision to the plan.
- 5) To satisfy the requirements of paragraph 63.342(f)(3), the owner or operator may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of this section.

- vii. The standards that apply to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent.

## 2. **Monitoring** (40 CFR 63.343)

- a. The owner or operator of an affected source subject to the emission limitations of this subpart shall conduct monitoring according to the type of air pollution control technique that is used to comply with the emission limitation. The monitoring required to demonstrate continuous compliance with the emission limitations is identified in 63.343 for the air pollution control techniques expected to be used by the owners or operators of affected sources.
- b. Packed-bed scrubber systems.
  - i. During the initial performance test, the owner or operator of an affected source, or group of affected sources under common control, complying with the emission limitations in 63.342 through the use of a packed-bed scrubber

system shall determine the outlet chromium concentration using the procedures in 63.344(c), and shall establish as site-specific operating parameters the pressure drop across the system and the velocity pressure at the common inlet of the control device, setting the value that corresponds to compliance with the applicable emission limitation using the procedures in 63.344(d)(4) and (5). An owner or operator may conduct multiple performance tests to establish a range of compliant operating parameter values. Alternatively, the owner or operator may set as the compliant value the average pressure drop and inlet velocity pressure measured over the three test runs of one performance test, and accept  $\pm 1$  inch of water column from the pressure drop value and  $\pm 10$  percent from the velocity pressure value as the compliant range.

- ii. On and after the date on which the initial performance test is required to be completed under 63.7, the owner or operator of an affected source, or group of affected sources under common control, shall monitor and record the velocity pressure at the inlet to the packed-bed system and the pressure drop across the scrubber system once each day that any affected source is operating. To be in compliance with the standards, the scrubber system shall be operated within  $\pm 10$  percent of the velocity pressure value established during the initial performance test, and within  $\pm 1$  inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant operating parameter values established during multiple performance tests.

### 3. **Record Keeping** (40 CFR 63.346)

The owner or operator shall meet the Record keeping requirements pursuant to 63.346. All records shall be maintained for a period of five years in accordance with 63.10(b)(1). Additional Record keeping requirements are specified in 40 CFR Part 63, Subpart A - General Provisions. The following table is a summary of the applicable Record keeping requirements specified in 63.346.

<b>Record Keeping Requirement</b>	<b>Reference</b>	<b>Frequency</b>
Inspection records for the air pollution control equipment and monitoring equipment to document that the inspection and maintenance required by the work practice standards of 63.342(f) and Table 1 of 63.342 have taken place.	63.346(b)(1)	Daily
Records of all maintenance work performed on the affected source, the add-on air pollution control equipment, and monitoring equipment.	63.346(b)(2)	As needed
Records of the occurrence, duration, and cause (if known) of each malfunction of the process, add-on air pollution control devices, and monitoring equipment.	63.346(b)(3)	As needed
Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan.	63.346(b)(4)	As needed

<b>Record Keeping Requirement</b>	<b>Reference</b>	<b>Frequency</b>
Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by 63.342(f)(3).	63.346(b)(5)	As needed
Test reports documenting results of any performance test conducted.	63.346(b)(6)	As needed
Records of monitoring data required by 63.343(c) including the date and time the data are collected.	63.346(b)(8)	Daily
Identification of each period of excess emissions as indicated by monitoring data.	63.346(b)(9) 63.346(b)(10)	As needed
Total process operating time for each affected source during the reporting period.	63.346(b)(11)	Monthly
Records of the actual cumulative rectifier capacity for each month of the reporting period and the total capacity expended. to date for a reporting period.	63.346(b)(12)	Monthly
Documentation supporting the notifications and reports required by 63.9, 63.10 and 63.347.	63.346(b)(16)	As needed

#### 4. **Reporting** (40 CFR 63.347)

The owner or operator shall comply with the reporting requirements pursuant to 63.347. The following table is a summary of the applicable reporting requirements.

<b>Reporting Requirements</b>	<b>Reference</b>	<b>Frequency</b>
Notification of performance tests	63.347(d)	As needed
Ongoing compliance status reports	63.347(g)(1)	Semiannually, except as specified in 63.347(g)(1)

**Emission Unit C1 Description:** Powder coating operation

**Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.08	Standards of Performance for New Process Operations	1, 2, 3.1, 3.2, and 3.3

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5 and 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

**Allowable Emissions:**

<b>Emission Pt</b>	<b>Regulated Air Pollutant</b>	<b>Limit/Standard</b>
E30	PM	2.34 lbs/hr
		< 20% Opacity
	TAPs	See AC # 1.c.

**Components:**

<b>Emission Pt</b>	<b>Description</b>	<b>Control ID</b>
E-30	Powder coating booth	N/A

**Control Devices:** There are no control devices associated with this Emission Unit.

**Addition Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)

a. **PM** (Regulation 7.08, Section 3)

For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 of Regulation 7.08. (section 3.3)



## b. Opacity

No person shall cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (section 3.1)

## c. TAP

The owner or operator shall not allow the emissions of TAPs to exceed the ASL value specified in Regulation 5.12, unless modeling or a BACT analysis has been submitted and approved by the District. TAPS identified in the permit application are: formaldehyde, titanium dioxide, toluene, iron, and carbon black.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

## a. PM

- i. The owner or operator shall perform weekly inspections of the PM filter system.
- ii. Additional compliance monitoring shall be the record keeping requirement specified in AC # 3.a.

## b. Opacity

- i. The owner or operator shall conduct a daily one (1) minute visible emission survey for stack S-30 for each operating day.
- ii. If during twelve (12) consecutive operating weeks there are no visible emissions from stack S-30, the owner or operator may elect to conduct monthly visible emission surveys.
- iii. If visible emissions are observed from stack S-30, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance. If visible emissions were observed, the owner or operator shall initiate the monitoring schedule specified in AC# 2.b.i. above.

## c. TAPs

Compliance monitoring for TAPs shall be the record keeping requirement in AC # 3.c.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

## a. PM

The owner or operator shall maintain daily records, except as noted otherwise, of the following information to monitor ongoing compliance with Regulation 7.08:

- i. The total quantity (in lbs) of coating used for each operating day;
- ii. The number of operating hours for each operating day;
- iii. The results of the weekly inspection required by AC # 2.a.i. including any maintenance or filter replacement that occurred. (Weekly)

## b. Opacity

The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from AC # 2.b.iii. above shall be documented and records made available to the District upon request.

## c. TAPs

The owner or operator shall maintain daily records of the following information to monitor ongoing compliance with Regulation 5.12:

- i. The total quantity (in lbs) of coating used for each operating day;
- ii. The number of operating hours for each operating day; and
- iii. The weight % of each TAP in each coating used.

4. **Reporting** (Regulation 2.16, Section 4.1.9.3)

## a. PM

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 7.08:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of all periods of exceedance of the PM emission standard including the quantity of excess emissions. If no exceedances of the PM emission standard occurred during the reporting period, the owner or operator may submit a negative declaration; and
- iv. Description of any corrective action taken to prevent future exceedances.

## b. TAP

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 5.12:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of all periods of exceedance of the TAP emission standards including the quantity of excess emissions. If no exceedances of TAP emission standards occurred during the reporting period, the owner or operator may submit a negative declaration; and
- iv. Description of any corrective action taken to prevent future exceedances.

**Emission Unit F1 Description:** Fiberglass Repair Facility

**Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3, 4, and 5

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5 and 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

**Allowable Emissions:**

<b>Emission Pt</b>	<b>Regulated Air Pollutant</b>	<b>Limit/Standard</b>
E32	VOC	See AC # 1 a.iv.
	Styrene	0.115 lbs/hr

**Control Devices:** There are no control devices associated with this Emission Unit.

**Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC (Regulation 7.25, section 3.1)
    - i. No owner or operator shall construct or operate an affected facility unless it is equipped with an utilizes Best Available Control Technology (BACT) as determined at the time of the construction permit review by the District. Emission rates in terms of pounds per hour and/or work practice, equipment specifications, and/or raw material specifications shall be set out as permit conditions on the construction and/or operating permits to ensure compliance with this requirement.
    - ii. Affected facilities permitted prior to December 16, 1987, that emit no more

emissions than that permitted at such date shall be deemed to be in compliance.

- iii. The time period for compliance determination shall not exceed 24 hours and may be less if limited by a permit restriction, but it shall not exceed the hours operated in a day.
- iv. The total plant-wide VOC emissions shall not exceed 5 tons during any consecutive 12-month period for all emission units subject to Regulation 7.25.

b. TAPs (Regulation 5.12)

For those TAPs not specifically listed in the “Allowable Emissions” section on page 43 of this permit, the owner or operator shall not allow the emissions of TAPs to exceed the ASL value specified in Regulation 5.12, unless modeling or a BACT analysis has been submitted and approved by the District.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. VOC

Compliance monitoring shall be the record keeping requirement in AC # 3.a.

b. TAPs

- i. The owner or operator shall monitor the daily usage rates of styrene to demonstrate that the emission rates established during the initial compliance demonstration are not exceeded.
- ii. Additional compliance monitoring shall be the record keeping requirement specified in AC # 3.b.

3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

a. VOC

The owner or operator shall maintain monthly records of the following information to demonstrate ongoing compliance with Regulation 7.25:

- i. The quantity of styrene or other VOC material used during each calendar month;
- ii. The number of operating days during each calendar month; and
- iii. The total VOC emissions for each calendar month.

b. TAPs

The owner or operator shall maintain the following daily records:

- i. The quantity of styrene or other TAP used; and
- ii. The number of operating hours for each operating day.

4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. VOC

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 7.25:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period; and
- iii. The twelve consecutive month VOC emissions for each month of the reporting period.

b. TAPs

The owner or operator shall include, at a minimum, the following Information in the semi-annual compliance monitoring reports for Regulation 5.12:

- i. Emission Unit ID number;
- ii. The beginning and ending date of the reporting period;
- iii. Identification of all periods of exceedance of the TAP emission standards including the quantity of excess emissions. If no exceedances of the TAP emission standard have occurred during the reporting period, the owner or operator may submit a negative declaration; and
- iv. Description of any corrective action taken to prevent future exceedances.

**Emission Unit PC Description:** Parts Cleaners (Cold Solvent)

**Applicable Regulations:**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.18	Standards of Performance for New Solvent Metal Cleaning Equipment	1, 2, 3, 4.1, 4.2, 4.3 and 4.4

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.12	Standards of Performance for New Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5 and 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

**Allowable Emissions:**

<b>Emission Pt</b>	<b>Regulated Air Pollutant</b>	<b>Standard/Limit</b>
E33	VOC	See AC # 1.a.
	TAPs	See AC # 1.b.

**Control Devices:** There are no control devices associated with this emission unit.

**Additional Conditions**

1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC (Regulation 7.18, Sections 3 and 4)
    - i. Control equipment
      - 1) The cleaner shall be equipped with a cover. If the VOC volatility is greater than 15 mm Hg measured at 100°F or if the VOC is agitated or heated, then the cover shall be designed so that it can be easily operated with one hand.
      - 2) The cleaner shall be equipped with a drainage facility such that VOC that drains off parts removed from the cleaner will return to the cleaner. If the VOC volatility is greater than 32 mm Hg measured at

100°F, then the drainage facility shall be internal so that parts are enclosed under the cover while draining. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system.

- 3) A permanent, conspicuous label summarizing the operating requirements in AC # 1.ii. shall be installed on or near the cleaner.
- 4) If used, the VOC spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing.
- 5) If the VOC volatility is greater than 32 mm Hg measured at 100°F or if the VOC is heated above 120°F, then one of the following control devices shall be used:
  - A. Freeboard that gives a freeboard ratio equal to or greater than 0.7,
  - B. Water cover (VOC must be insoluble in and heavier than water), or
  - C. Other systems of equivalent control, such as a refrigerated chiller or carbon absorption.

ii. Operating Requirements

- 1) Do not dispose of waste VOC or transfer it to another party in a manner that more than 20% by weight of the waste VOC can evaporate into the atmosphere. Store waste VOC only in covered containers.
- 2) Close degreaser cover whenever not handling a part in the cleaner.
- 3) Drain cleaned parts until dripping ceases (15 seconds is usually necessary).
- 4) Do not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F).

b. TAPs (Regulation 5.12)

The owner or operator shall not allow or cause the emissions of TAP's to exceed the ASL value, unless modeling or a BACT analysis has been submitted and approved by the District.

2. **Monitoring** (Regulation 2.16, section 4.1.9.1.2)

a. VOC

- i. The owner or operator shall conduct weekly inspections to verify ongoing compliance with the control and operational requirements specified in AC # 1.a.i. and 1.a.ii.

b. TAP



Compliance monitoring for the TAP emission standards shall be the record keeping requirement in AC # 3.b.

3. **Record Keeping**

a. VOC

i. The owner or operator shall maintain records that include the following for each purchase:

- 1) The name and address of the solvent supplier,
- 2) The date of the purchase,
- 3) The type of the solvent, and
- 4) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

ii. The owner or operator shall maintain records of the results of the inspection requirement specified in AC # 2.a.i.

b. TAP

The owner or operator shall maintain monthly records of the quantity of each solvent used including the weight % of each TAP.

4. **Reporting**

a. VOC/TAP

There are no compliance monitoring reports required for these pollutants.

### Permit Shield

The owner or operator has requested and is hereby granted a permit shield. The permit shield applies as long as the owner or operator operates in accordance with the terms and conditions of this permit. The following NSPS rules have been reviewed by the District and determined not to be applicable to the emission units and/or emission points listed.

40 CFR Part 60, Subpart Dc

Standards of Performance for Industrial-Commercial - Institutional Steam Generating Units. Emission Unit B3-B6 - The four boilers in operation at the UDLP facility were installed in 1952 and modified in 1982 prior to the June 1989 promulgation date of Subpart Dc.

### Off Permit Documents

There are no Off-Permit documents associated with the issuance of this operating permit.

### Alternative Operating Scenarios

Description

EU/Page

Fuel types

B3-B6 / 13

Source-Wide HAP Speciation			
HAP	CAS No.	HAP	CAS No.
Ethyl benzene	100414	m-Xylene	108383
Hydrochloric acid	7647010	Cadmium compounds	N/A
Methanol	67561	Chromium compounds	N/A
Methyl Ethyl Ketone	78933	Cyanide compounds	N/A
Methyl Isobutyl Ketone	108101	Lead compounds	N/A
Phenol	108952	Manganese compounds	N/A
Toluene	108883	Nickel compounds	N/A

Note: HAPs cited in the table above are those currently known to be used at this plant.

<b>Insignificant Activities</b>		
<b>Description</b>	<b>Quantity</b>	<b>Basis</b>
Internal combustion engines fixed or mobile	Various	Regulation 2.02, section 2.2
Brazing, soldering or welding operation	Various	Regulation 2.02, section 2.3.4
Dipping operations - coating objects with oils, waxes, or greases	Various	Regulation 2.02, section 2.3.9.1
Lab venting and exhaust systems (non radioactive materials)	Various	Regulation 2.02, section 2.3.11
Heat treating, soaking, case hardening or surface conditioning of metal objects - natural or lp gas only	Various	Regulation 2.02, section 2.3.14
Combustion sources (< 10 MMBtu/hr)	16	Regulation 2.02, section 2.1.1
Wasting or drying fabricated metal or glass Non VOC use - no oil or solid fuel	Various	Regulation 2.02, section 2.3.15
Blast cleaning using abrasives in water	1	Regulation 2.02, section 2.3.13
PM collectors venting indoors	6	Regulation 2.02, section 2.3.21
Portable gas storage tanks	1	Regulation 2.02, section 2.3.23
Plasma arc cutting equipment	1	Negligible emissions
Car bottom furnace (natural gas)	1	Negligible emissions
Waste water treatment facility	1	Negligible emissions
Storage tanks containing aqueous HCl, NaOH and NaHSO <sub>3</sub>	Various	Negligible emissions

1. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.

2. Activities identified In Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.

- a. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for

facilities not otherwise regulated.

- b. No periodic monitoring shall be required for facilities designated as insignificant activities.
3. The Insignificant Activities table is correct as of the date the permit was proposed for review by the USEPA, Region 4. The company shall submit an updated list of insignificant activities annually with the Title V compliance certification pursuant to District Regulation 2.16, section 4.3.5.3.6.